

**Cover Letter for Submission of Exhibits A**

**Aaron Hansome**

1st Texas Health & Life LLC

222 N. Expressway suite 159

Brownsville, Texas 78521-2258 (Cameron County)

**Email Address:** AaronMHansome@gmail.com

**Date:** January 6, 2025

**To:**

Honorable Judge Reed C. O'Connor

United States District Court

Northern District of Texas

501 W. 10th St., Rm. 310

Fort Worth, TX 76102

**Re:** Case No. 4:24-cv-01022

**Plaintiff:** Mrs. Kelly Bland

**Defendant:** Aaron Hansome

Dear Honorable Judge O'Connor,

**Subject:** Submission of Exhibits A-1 through A-22 – Chronology of Events

I respectfully submit **Exhibits A-1 through A-22**, which provide a detailed chronology of events and evidence relevant to the claims and defenses in this matter. These exhibits outline my good-faith compliance efforts, vendor misconduct, and interactions with the Plaintiff, Mrs. Kelly Bland (formerly Mrs. Kelly Pinn). The evidence supports my defense against her allegations

under the Telephone Consumer Protection Act (TCPA) and highlights the challenges posed by her litigation history.

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## **Exhibit Summary**

### **1. Exhibit A-1 to A-2:**

- WhatsApp conversations with P-Tech's CEO regarding sending DNC lead list.
- Contains acknowledgment of DNC violations and litigation risks.

### **2. Exhibit A-3 to A-4:**

- **Email communications with DataZapp regarding scrubbing failures.**
- **Includes their confirmation that flagged DNC numbers were not removed automatically.**

### **3. Exhibit A-5:**

- Scrubbed list from DataZapp showing flagged but unremoved DNC numbers.

### **4. Exhibit A-6 to A-7:**

- **Transcriptions of inbound calls from Mrs. Bland (then Mrs. Pinn), demonstrating her active engagement and lack of disclosure about her DNC status.**

### **5. Exhibit A-8 to A-12:**

- Correspondence and settlement demands from Mrs. Bland.
- Shows escalating demands from \$8,000 to \$12,000, and threats of litigation.

### **6. Exhibit A-13 to A-16:**

- **RingCentral call logs detailing inbound calls from Mrs. Bland.**
- Includes emails where she references her litigation history and demands payments via Zelle, Venmo, or wire transfer.
- **Exhibit A-14 specifically documents P-Tech vendor details turned over to Wes Newman, whose information was on the same list as Mrs. Bland, to address compliance issues and ensure transparency.**
- **Exhibit A-16 is where Mrs. Pinn (now Mrs. Bland) invites me to “google or search her in PACER to confirm her sincerity”**

**7. Exhibit A-17:**

- **I offered Mrs. Pinn (now Mrs. Bland) a \$300 installment which she ignored.**
- My explanation to Mrs. Bland that her information originated from a vendor in breach of their compliance agreement.

**8. Exhibit A-18 to A-20:**

- Emails and documentation showing Mrs. Bland’s new name (Bland) and email, which initially obscured her identity.
- Her final settlement demand and subsequent filing of the lawsuit.

**9. Exhibit A-21:**

- Notification of the lawsuit received via BizFilings.

**10. Exhibit A-22:**

- **Unsworn declaration from P-Tech CEO acknowledging their breach of compliance and indemnification obligations.**

These exhibits are integral to illustrating the series of events, my compliance efforts, and the pattern of behavior exhibited by the Plaintiff. I have redacted sensitive personal information, including phone numbers and email addresses, to ensure privacy and compliance with court rules.

Thank you for your time and consideration. Please let me know if the court requires further clarification or additional documents.

Respectfully submitted,

**Aaron Hansome**

Pro Se Defendant

1st Texas Health & Life LLC

AaronMHansome@gmail.com

### **Notice of Redaction**

This document contains redactions to protect sensitive personal information, including phone numbers listed on the DNC registry and my personal phone number, to ensure compliance with privacy regulations and avoid misuse.

### **Notice of Formatting Clarification**

I respectfully bring to the Court's attention that I recently learned of the double-spacing requirement for filings. As a pro se litigant, I am making every effort to comply with the Court's rules, but I acknowledge that some of the documents I filed may not fully adhere to this requirement.

If the Court finds that the current formatting impedes clarity or compliance, I am prepared to resubmit the affected documents with the correct formatting promptly. I sincerely apologize for any inconvenience this may have caused.

Respectfully submitted,

**Aaron Hansome**

Pro Se Defendant

[9:05 AM, 4/9/2024] Aaron: We are not getting any calls. Nothing

[9:06 AM, 4/9/2024] Amjad P-Tech: Everyone is running off home

Let me see

[9:22 AM, 4/9/2024] Aaron: We're looking for a new vendor Amjad. We won't survive with no calls

[9:22 AM, 4/9/2024] Amjad P-Tech: You'll get a few calls

[9:22 AM, 4/9/2024] Amjad P-Tech: I have 7 guys

[9:22 AM, 4/9/2024] Amjad P-Tech: In a bit

[9:22 AM, 4/9/2024] Amjad P-Tech: And giving you call back leads

[9:22 AM, 4/9/2024] Aaron: We're dying here

[9:23 AM, 4/9/2024] Amjad P-Tech: Hang in there let me send you the leads

[9:23 AM, 4/9/2024] Aaron: I didn't realize this would happen by only hiring vendors in Pakistan . I should've mixed in some other countries lol

[12:46 PM, 4/9/2024] Amjad P-Tech: Put this on auto dialer

[1:30 PM, 4/9/2024] Amjad P-Tech: There ?

[2:22 PM, 4/9/2024] Aaron: Sorry brother, I've been using the time to work on our other business, borrower defense

[2:25 PM, 4/9/2024] Amjad P-Tech: Ok

[2:25 PM, 4/9/2024] Amjad P-Tech: Also let me know once sheet is updated

[2:28 PM, 4/9/2024] Aaron: This list only has phone numbers

[2:28 PM, 4/9/2024] Amjad P-Tech: Yess

[2:28 PM, 4/9/2024] Amjad P-Tech: Its for the dialer

[2:28 PM, 4/9/2024] Aaron: If you don't know their name, what script do you use? We're going to need it

[2:29 PM, 4/9/2024] Aaron: We usually only buy data with the prospects info, at least their name and state

[2:29 PM, 4/9/2024] Amjad P-Tech: Try it

[2:29 PM, 4/9/2024] Aaron: We're going to need a script for it if you've got one

[2:29 PM, 4/9/2024] Amjad P-Tech: Its resultful

[2:29 PM, 4/9/2024] Amjad P-Tech: Resultful

[2:29 PM, 4/9/2024] Amjad P-Tech: Let me share

[2:29 PM, 4/9/2024] Amjad P-Tech: Shrotly

[2:30 PM, 4/9/2024] Aaron: Do you just say "we're following up on your health insurance request" or do you pitch the wellness rewards and carrier benefits?

[2:31 PM, 4/9/2024] Aaron: That's what I mean, are these opt-in?

[2:31 PM, 4/9/2024] Amjad P-Tech: If you take the lead with " calling in regards to Missing benefits "

That angle will get them on the hook and you can even get them to switch your plan

[2:37 PM, 4/9/2024] Amjad P-Tech: Good morning this Daniel from health care solutions how are you doing today doing good

The reason of my short call is to reconfirm that have you received your additional benefits for the year of 2024 that includes your dental, vision, hearing prescriptions along with generic drugs and other updated stuff from your health care policy

[2:37 PM, 4/9/2024] Amjad P-Tech: We dont use this

But it works best

[4:22 PM, 4/9/2024] Amjad P-Tech: Are u updating the sheet ?

[4:52 PM, 4/9/2024] Aaron: Sorry, I've been trying to get us set up for tomorrow. We got 10 total calls today

[4:52 PM, 4/9/2024] Aaron: I'm trying to keep us in business brother. I will be working late tonight so I'll be back in the office here in about an hour or two

[5:19 PM, 4/9/2024] Amjad P-Tech: We'll be back on Monday full fledge

[6:35 PM, 4/9/2024] Aaron: If we're still alive then that will be great lol

[6:35 PM, 4/9/2024] Aaron: Hired an American company today. They start tomorrow

[6:39 PM, 4/9/2024] Amjad P-Tech: We are still sending some volume

[6:39 PM, 4/9/2024] Amjad P-Tech: I know its low but please understand EID for us is what christmas is for you

[8:28 PM, 4/9/2024] Aaron: 37% of this list was on the DNC Brother. Like I said, as soon as we get sued we're out of business

[8:46 PM, 4/9/2024] Amjad P-Tech: The data file ?

[8:46 PM, 4/9/2024] Amjad P-Tech: We scrubbed it for litigators via BLA

[11:39 AM, 4/10/2024] Aaron: Something went wrong with the scrub, and we're calling people on the DNC

[11:40 AM, 4/10/2024] Aaron: Bro, you have got to scrub

[11:40 AM, 4/10/2024] Aaron: this will definitely end up in a law suit, if it hasn't already

[11:40 AM, 4/10/2024] Aaron: We can't buy illegal calls Amjad

[11:41 AM, 4/10/2024] Aaron: We have already terminated a few other vendors for this. It's very serious

[11:41 AM, 4/10/2024] Aaron: We are off the dialer until I get a new scrub on your list. 37% DNC bro. That's really bad

[11:51 AM, 4/10/2024] Amjad P-Tech: Let me scrub it and send it back

[11:52 AM, 4/10/2024] Aaron: I already did it

[11:53 AM, 4/10/2024] Aaron: There's so many you can't even see them bro lol

[11:53 AM, 4/10/2024] Aaron: [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

← Mrs. Pinn's Number

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



[REDACTED]

[12:14 PM, 4/10/2024] Amjad P-Tech: Bro we opt-ed to only scrub litigators as some buyers accept fdnc and sdnc

[12:18 PM, 4/10/2024] Aaron: I've had a call from two probers looking to sue our company

[12:18 PM, 4/10/2024] Aaron: I'll send you their phone numbers so you can send me the opt in verification

[12:21 PM, 4/10/2024] Amjad P-Tech: Please do not dial the data file i sent you  
Im sending you the file after scrubbing again in 20min

[12:43 PM, 4/10/2024] Aaron: We already scrubbed it

[12:57 PM, 4/10/2024] Amjad P-Tech: In a meeting  
Im free in 10

[1:08 PM, 4/10/2024] Aaron: ( [REDACTED] ) ← Gentleman that told me he was on the DNC

[3:03 PM, 4/10/2024] Aaron: That call back was a couple of hours ago

[3:05 PM, 4/10/2024] Aaron: On the DNC since 2018. I blocked the number, but this has caused a lot of problems for us today bro. If I had realized your list wasn't clean, and my guy didn't remove the bad numbers I definitely wouldn't have put it in the dialer

Phone scrub from last night

Aaron Hansome <aaron@advancedfranchising.com> Wed, Apr 10, 2024 at 11:33 AM  
To: robert@datazapp.com  
Bcc: 44668131@bcc.hubspot.com

From the first ACA list I paid for and scrubbed, a guy called back and said he's on the DNC, and I checked his number and he is!  
[REDACTED]

What did I do wrong? Are the DNCs not automatically removed from the downloaded copy?  
  
Thanks Robert!

Kindest Regards,



Aaron Hansome  
President & Broker  
US: +1 619 387 9773  
Main: +1 800 550 6509  
Mx: +52 1 664 641 1658  
  
600 W Broadway Ste 700  
San Diego, CA 92101



[Quoted text hidden]

## Phone scrub from last night

robert@datazapp.com <robert@datazapp.com>

Wed, Apr 10, 2024 at 11:44 AM

To: Aaron Hansome <aaron@advancedfranchising.com>

Oh I see the confusion – no, the DNC numbers ARE NOT automatically removed when you download.

You'll see a DNC status column with Yes or No values next to each phone.

“Yes” means it's DNC, “No” means it's not DNC.

Robert Carroll

Customer Success Manager

Email: [robert@datazapp.com](mailto:robert@datazapp.com)

Direct: (386) 313-0297

Comp: (386) 262-1448

Web:[www.datazapp.com](http://www.datazapp.com)

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**From:** Aaron Hansome <aaron@advancedfranchising.com>

**Sent:** Wednesday, April 10, 2024 2:33 PM

**To:** [robert@datazapp.com](mailto:robert@datazapp.com)

**Subject:** Re: Phone scrub from last night

From the first ACA list I paid for and scrubbed, a guy called back and said he's on the DNC, and I checked his number and he is!

[illegible]

## Exhibit A 6- Call Transcription

A6


**Mrs. Pinn calls back, and acts as if she might be interested in insurance.**

### SPEAKERS

Aaron Hansome, & Speaker 2

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**A** Aaron Hansome 00:02 **I was confused about which business line I was answering and answered for my other business**  
Legal touch. This is Aaron,

**S** Speaker 2 00:04 **Mrs. Pinn admits to calling me back from after claiming in her first email (Exhibit A8) dated 4-18-27 that she was transferred.**  
hi. I just had a missed call from this number. 

**A** Aaron Hansome 00:07  
Oh, so we were probably calling to see if you had got your your health benefits for 2024 with your additional subsidies that the major insurance carriers are giving out for the Affordable Care Act.

**S** Speaker 2 00:22  
Okay, did you say legal tax?

**A** Aaron Hansome 00:25  
Legal legal touch, that's, that's, one of our businesses,

**S** Speaker 2 00:29  
legal touch, right?

A6

A

Aaron Hansome 00:32

Yeah, but we were, we were calling about the Affordable Care Act. It's 100% subsidized insurance for folks that have an income of 25k or less per year.

S

Speaker 2 00:43

Okay? And how did you get my information?

A

Aaron Hansome 00:47

We have you as coming in as a an inquiry, a health inquiry.

S

Speaker 2 00:52

Okay, from where

A

Aaron Hansome 00:54

I'm not sure. I'm not sure where the inquiry came in. Were you not looking for health insurance?

S

Speaker 2 01:01

I I don't have health insurance at the moment, so, but, yeah, okay, I was just, I was just a little thrown off by the call. Or is this something that I can do online to like, can you help me through this online? Or is it something that you have to help me with?

A

Aaron Hansome 01:18

It's either way. You could go through healthcare.gov but since we're licensed insurance agents, we can bring everything up for you really quickly. We can get you like the cheapest with the most coverage and the additional benefits to the major insurance carriers have started offering incentives for getting a health plan. There are sign up and referral bonuses, discounts on groceries, gas, counseling, gym, supplements, and we could pull that up and look at all that for you and get you a health plan, like, really quickly.

S

Speaker 2 01:50

Okay, and are you guys on Facebook?

A

Aaron Hansome 01:55

Yes, yeah. We have a we have a Facebook page that's First Texas, national health and life.

S

Speaker 2 02:03

Okay, hold on a second. And is that here in in Dallas, or in Fort Worth?

A

Aaron Hansome 02:11

Yes, so it's in our offices in Brownsville. But we're, we're a nationally credentialed office, so we service the whole country.

S

Speaker 2 02:21

Okay? You said First Texas, national health, yeah. And actually,

A

02:25

if you wanted to go to our directly to our website, it's 1s t, e, X, A S,

S

Speaker 2 02:36

uh huh,

A

Aaron Hansome 02:37

national n, a T, I O N, A L,

S

Speaker 2 02:41

okay. Well, hold on, just a second. Hold on, sorry, first national,

A

Aaron Hansome 02:48

so it's it's 1s T,

A

02:51

uh huh,



A

Aaron Hansome 02:51

the first and then Texas, so 2t T, E, S, A S, and then national n, a T, i o, n, a, l, okay.com,

S

Speaker 2 03:08

nothing's coming up. There's like a First Texas bank, First Texas national.com

A

Aaron Hansome 03:22

Yeah, what, S T, E, X, A, S n, a T, I O N, A l.com,

S

Speaker 2 03:34

let me try to put it in a different way.

A

Aaron Hansome 03:40

And there's actually a video of me right in the front, a YouTube video of me,

S

Speaker 2 03:47

oh yes, yes, yes, yes, yes,

A

Aaron Hansome 03:49

got your, got your \$900 per month payment. So that's the that's the subsidy. So this is subsidized insurance, so that the government pays for it through the Affordable Care Act.

S

Speaker 2 03:59

Okay, I see. Okay, well, let me do this. I am actually cooking right now, and I wasn't expecting the call, so let me do a little bit of research and talk to my husband, and if I'm interested, I will give you a call back. We've got a lot of other things going on right now, so call back, but I don't need to get any additional calls. Okay,

A

Aaron Hansome 04:24







okay, you got it all right. Thanks so much. We're just checking Thank you. Yes sir. Have a great day. You too. Bye, okay? Bye.

Our office receives another call from Mrs. Pinn's number but no agent introduces her, and she doesn't disclose that she's on the DNC or hasn't opted in. She acts interested in insurance a 2nd time.

**SPEAKERS**

Aaron Hansome, Speaker 2, Speaker 1

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-  Speaker 1 00:02  
Health and life. Are you looking for free health coverage? Yes, I am okay. May I have your first and last name please? Yeah, it's a Kelly Pinn. Okay. And May I have the zip code You're in,
-  Speaker 2 00:29  
yeah,
-  Speaker 1 00:34  
76103,correct.
-  Speaker 2 00:37  
No, 76108,
-  Speaker 1 00:40  
0, eight, okay, sorry about that.
-  Speaker 2 00:40  
okay,

S

Speaker 1 00:46

And your date of birth,

S

Speaker 2 00:50

a, 531 seven.

S

Speaker 1 00:55

Okay, you were cutting off on 531

S

Speaker 2 00:57

79

S

Speaker 1 01:00

79 70 nine. Okay, thank you. Have you recently applied for Medicaid?

S

Speaker 2 01:10

No, no, and have

S

Speaker 1 01:13

you ever had va insurance?

S

Speaker 2 01:17

Oh, I didn't serve more. Okay,

S

Speaker 1 01:19

anyone FFM certified, like our office, can get into the marketplace to see what you have. But CMS requires that we obtain consent. So I would like to play you a consent disclosure on our recorded line, so that we're authorized to help you find a health plan. It takes about two minutes to listen to disclosure recording, and for us to find your plan, you must agree. Do I have permission to play the recording. Yes, okay, I'll be back with you as soon as the recording is over. Immediately.

A

Aaron Hansome 01:51

CMS requires health insurance agents to obtain a customer's consent prior to helping them apply for a subsidy and or enroll in a marketplace qualified plan or QHP, we at first, Texas health and life are authorized to collect personally identifiable information or PII from you by the Centers for Medicare and Medicaid Services. That's CMS. Any PII we collect is used to help you enroll in a marketplace qualified plan and other related products you select, if applicable. If you choose to give us PII, this information will only be shared with CMS and the insurer at the time of enrollment, CMS will maintain this information in a federal system of records. PII is used or disclosed only under the following circumstances, one to compare insurance plans based on costs, benefits and other important features. Two, to determine your eligibility for health coverage and cost sharing reductions through healthcare.gov, or another, Ede enrollment portal, or three, to choose a plan and enroll in health coverage. Providing PII data is voluntary if you choose not to provide PII information or not to respond to certain required healthcare.gov questions, you will not be able to enroll in a Qualified Health Plan. By agreeing to this disclosure, you authorize First Texas health and life LLC and its associates to enroll you in a marketplace qualified health plan to apply for financial help and for us to conduct online application searches on the federal marketplace. You've been made aware that if your information changes or you no longer need coverage, you must contact the agency via our provided contact information or the marketplace directly at 803 1825964, 82596, you authorize our agency and its associates to contact you via telephone, email or SMS, text messages related to your enrollment. If you need to make changes to your enrollment or you want to revoke consent to the agent or agency, you may do so via email at support the at symbol First Texas that's with the one SP national.com that's support at First Texas national.com or by calling our toll free number 800-550-6509 do we have your consent and agreement to find you A qualified health plan? Please clearly state yes or

S

Speaker 1 04:26

Hello. Was I able to get your consent? Hello, hello, hello, hello, Miss Kelly, hello, I'm at the hang up. There's no answer. Miss Kelly.

Violations of the Telephone Consumer Protection Act (TCPA)

Kelly Pinn <[REDACTED]@gmail.com>

Thu, Apr 18, 2024 at 12:43 PM

To: "Support" <Support@1sttexasnational.com>, "AARON" <AARON@advancedfranchising.com>

Cc: <AARONMHANSOME@gmail.com>

4/18/2024

1st Texas Health & Life LLC  
403 GILMER ST  
SULPHUR SPGS, TX 75482-4048

Re: Violations of the Telephone Consumer Protection Act (TCPA)

Delivered via email

Aaron Hansome  
TX License # 2785913  
FL License # W902348  
Utah License # 908698

Attn: Aaron Hansome/Corporate Officers

Good afternoon. My name is Kelly Pinn and I'm contacting you today regarding communications to my phone that are in violation of the TCPA. These unwelcome and unwanted communications were made using an automated telephone dialing system without my prior, express, written consent, as required by law. These illegal communications came to my phone number, [REDACTED] as follows:

- 1. 11/6/2023 10:20 am CST incoming call from autodialed illegally spoofed number (817) 535-0523 Nationwide Ins-told not interested,stop calling
- 2. 4/10/2024 11:26 am CST incoming call from prerecorded autodialed number (800) 733-3070
- 3. \*4/10/2024 11:51 am CST outgoing call to number (800) 733-3070, transferring me to Aaron Hansome with 1st Texas Health & Life LLC-I advised I did not wish to receive any additional calls
- 4. 4/16/2024 5:46 pm CST incoming call from autodialed illegally spoofed number (817) 535-0523 - Marketplace, transferring me back to !st Texas Health & Life LLC, where a recording was played regarding Pll, identifying the company a second time

47 U.S.C. §227(b) stipulates that it shall be unlawful for any person within the United States, or any person outside the United States if the recipient is within the United States to initiate any telephone call to any residential telephone line using an automated dialing system, artificial or prerecorded voice to deliver a message without the prior express consent of the called party, unless the call is initiated for emergency purposes or is exempted because of an existing business relationship.

Furthermore, 47 U.S.C. §227(c) makes two communications to residential telephone lines within a 12-month period listed on the National Do Not Call Registry a violation as well. As you can see from the attached confirmation, my number was lawfully entered on the National Do Not Call Registry on 2/9/2009.

The TCPA also provides for a private right of action, with each violation entitling me to a \$500 penalty, which can be increased to **\$1,500 per violation**, in the event such a violation is deemed to have been willfully or knowingly made. Reasonable court costs for bringing a private right of action against your company are also recoverable in the event of a successful action for those violations. In the absence of the federally required, express, prior, written consent, or any qualifying, "existing business relationship", you have violated the TCPA as indicated above, thus affording me the right to pursue the statutory penalties described above, as well as reasonable court costs. The statutory damages I am entitled to total **\$9,000**.

However, in the interest of helping you avoid the imposition and expense of civil litigation, I would like to afford you an opportunity to settle this matter for the amount of **\$8,000**. In exchange for that amount, I will forgo any civil action, release your companies of all claims associated with the illegal communications named herein, and consider the matter closed.

Inasmuch as I'm confident that the facts of this case would not support any manner of tenable defense for your company, I would urge you to carefully consider accepting this generous, good faith offer to settle. Should you decline it, or fail to respond within 5 days from its time-tracked delivery, please know that I reserve the right to pursue civil action as described herein, in state or federal court, and will seek all available injunctive and monetary relief made available to me under applicable federal statute. You should fully expect a lengthy and detailed discovery process to accompany that suit.

Additionally, I would insist that you give me every assurance that the offending communications that are the subject of this matter be the very last that I receive. I would also encourage you to take the necessary steps to ensure compliance with state and federal statutes moving forward, not only as a matter of protection from civil liability, but also as a courtesy to the millions of American consumers who are consistently plagued with these types of unwanted, illegal communications.

**\*\*\*\*\*I am aware of other consumers who have previously advised you of similar illegal calls being placed on your behalf, and consider these calls willful and intentional\*\*\*\*\*** I look very forward to your response, within 5 days of your receipt of this notice, as directed above. I would ask that all further communication be in writing via email, if only as a means by which the content of such communication will be memorialized. This also serves as a notice to revoke consent, ending any existing business relationship; please provide a copy of your Do Not Call Policy immediately and add my number to your internal do not call list.

Respectfully,

Kelly Pinn  
(817) 903-2161  
kpinn516@gmail.com

as my confirmation that P-Tech is terminated.

[8:01 PM, 4/18/2024] **Aaron: (817) 535-0523**

[8:01 PM, 4/18/2024] **Aaron: Is that your outbound number?**

[8:01 PM, 4/18/2024] Amjad P-Tech: ?

[8:01 PM, 4/18/2024] Amjad P-Tech: Ill have to check why

[6:57 AM, 4/19/2024] Aaron: What did you find out? Is that number yours?

[6:57 AM, 4/19/2024] Amjad P-Tech: We dont have an outbound number

[6:59 AM, 4/19/2024] Aaron: Okay I'm just doing research right now. I'll explain everything when I find out what's going on

[7:15 AM, 4/19/2024] Amjad P-Tech: Enlighten me, maybe I can help

[7:21 AM, 4/19/2024] Aaron: When it's time

[7:21 AM, 4/19/2024] Aaron: Right now I just need to know if that's your outbound number

[7:52 AM, 4/19/2024] Amjad P-Tech: 8175350523

[7:52 AM, 4/19/2024] Amjad P-Tech: Here you go ^^^^

[8:15 AM, 4/19/2024] Aaron: I'm talking about your outbound DIDs, not a phone number that you called

[8:15 AM, 4/19/2024] Amjad P-Tech: Its not this otherwise there would be a reocrd and we only send out cx caller id

[8:31 AM, 4/19/2024] **Aaron: It's from the list you sent us Amjad**

[8:31 AM, 4/19/2024] **Aaron: We have a litigator demanding \$8000 now**

[8:39 AM, 4/19/2024] **Aaron: You sent us this litigator in this list brother**

[8:40 AM, 4/19/2024] **Aaron: I just found it in there**

[8:40 AM, 4/19/2024] **Aaron: And we are still getting complaints about people being on the DNC, even this morning**

[8:40 AM, 4/19/2024] **Aaron:** [REDACTED] <~~ Mrs. Pinn's Phone Number

[8:41 AM, 4/19/2024] **Aaron: The lady at this phone number is demanding \$8,000 right now**

[8:41 AM, 4/19/2024] Aaron: And she has proof

[8:47 AM, 4/19/2024] Amjad P-Tech: Bro all my transfers are clean !!

[8:48 AM, 4/19/2024] Amjad P-Tech: We can sort this

[8:49 AM, 4/19/2024] Amjad P-Tech: I have no reord of transfer in my dialer

[8:49 AM, 4/19/2024] Amjad P-Tech: Look at this

[8:49 AM, 4/19/2024] **Aaron: You sent her to us on that list brother. Unless you have opt-in proof your calls are in violation of US TCPA, and DNC laws**

[8:49 AM, 4/19/2024] **Aaron: It's from your file**

[8:50 AM, 4/19/2024] Amjad P-Tech: Yes it could be from tha file

[8:50 AM, 4/19/2024] Amjad P-Tech: Dont worry. Let me know when free

[8:50 AM, 4/19/2024] Amjad P-Tech: For a call we will sort

[8:51 AM, 4/19/2024] Aaron: You need to talk to her, not me.

[8:57 AM, 4/19/2024] Aaron: I have to jump into a meeting, but it's serious brother.

[8:57 AM, 4/19/2024] Aaron: We don't have \$8000 for her

[8:58 AM, 4/19/2024] Aaron: I told you, one lawsuit will shut us down, and you still sent me a litigator.  
 My mind is blown

[9:53 AM, 4/19/2024] Aaron: Ok, I'm free Amjad

 Mrs. Pinn's Email Pasted into WhatsApp Chat

[9:57 AM, 4/19/2024] Aaron: 1st Texas Health & Life LLC

403 GILMER ST

SULPHUR SPGS, TX 75482-4048

Re: Violations of the Telephone Consumer Protection Act (TCPA)

Delivered via email

Aaron Hansome

TX License # 2785913

FL License # W902348

Utah License # 908698

Attn: Aaron Hansome/Corporate Officers

Good afternoon. My name is Kelly Pinn and I'm contacting you today regarding communications to my phone that are in violation of the TCPA. These unwelcome and unwanted communications were made using an automated telephone dialing system without my prior, express, written consent, as required by law. These illegal communications came to my phone number, [REDACTED], as follows:

4/10/2024 11:26 am CST incoming call from prerecorded autodialed number (800) 733-3070

4/10/2024 11:51 am CS...

[11:14 AM, 4/19/2024] Aaron: Amjad, can you please get me the times this number 8179032161 was transferred to us?



[11:16 AM, 4/19/2024] Amjad P-Tech: Its been blocked 90+ times from being dialed out

[11:19 AM, 4/19/2024] Aaron: What were the dates? When was the last time she was sent to us?

[11:19 AM, 4/19/2024] Amjad P-Tech: Are u sure i sent her ?

[11:20 AM, 4/19/2024] Amjad P-Tech: Or did you dial out ?

[11:20 AM, 4/19/2024] Aaron: You definitely sent her on the list I called Amjad, line 43 brother

[11:20 AM, 4/19/2024] Amjad P-Tech: Ok

[11:35 AM, 4/19/2024] Aaron: Do you want me to copy you in my email response, as the responsible party?

[11:36 AM, 4/19/2024] Amjad P-Tech: Yes

[11:36 AM, 4/19/2024] Amjad P-Tech: Lets get you out of this

[4:15 PM, 4/19/2024] Amjad P-Tech: No pick up ?

[4:16 PM, 4/19/2024] Amjad P-Tech: Any update on this ?

[4:24 PM, 4/19/2024] Aaron: The guys ended at 4 today, a little early because it's Friday

[4:25 PM, 4/19/2024] Amjad P-Tech: Ok. Are you free for a short call ?

[4:25 PM, 4/19/2024] Amjad P-Tech: Just 2 mins needed to discuss

[4:25 PM, 4/19/2024] Amjad P-Tech: The litigation

[4:26 PM, 4/19/2024] Aaron: Unless you want to reach out to this lady and get evidence that she's going to back off, I have to deal with this \$8000 threat you created here brother. You have seriously jeopardized my company Amjad. I really wish I had never taekn that list now.

[4:26 PM, 4/19/2024] Aaron: There as anther guy that also somehow got my Whatsapp number today claiming the same thing

[4:26 PM, 4/19/2024] Aaron: I blocked him, but he can sue

[4:27 PM, 4/19/2024] Aaron: I can't block that

[4:27 PM, 4/19/2024] Aaron: Please give me 30 minutes. I'm buried

[4:38 PM, 4/19/2024] Amjad P-Tech: Ok

[4:39 PM, 4/19/2024] Amjad P-Tech: I can reach out to her

[4:52 PM, 4/19/2024] Amjad P-Tech: I will reach out in regards to a settlement. Whatever amount we settle on. We will pay her.

We will generate that extra revenue by sending more transfers to your current and new agents.

[4:53 PM, 4/19/2024] Amjad P-Tech: Second option: Call the bluff, sometimes people dont want to file for litigation and may message/email for a quick buck. If you dont get scared they may not take any action at all. But that is risky

[4:56 PM, 4/19/2024] Amjad P-Tech: We are hunting a data base used by Major Call Centers in Pakistan to find any website this cx may have opt-ed in and how many times

[4:57 PM, 4/19/2024] **Aaron: She acted like she wanted insurance when she called in, but did ask us to stop calling**

We have a few options. Dont worry we will sort this

Also send me nes newmans number

[6:12 PM, 4/19/2024] Aaron: Litigator -Wes Newman

+1 [REDACTED] <~~ Wes Newman's number, also on the list.

[6:13 PM, 4/19/2024] Aaron: I got that from WhatsApp. I saw he als otried connecting on Linked In, which I no longer use

[6:14 PM, 4/19/2024] Aaron: +1 [REDACTED]

[6:14 PM, 4/19/2024] Aaron: He's on your file.

[6:18 PM, 4/19/2024] Aaron: I scrubbed them on the 9th

[6:18 PM, 4/19/2024] Aaron: But I didn't know I had to remove the DNCs, that they were only marked, and not removed.

[6:28 PM, 4/19/2024] Aaron: In case this goes to court you need to get me a new company, and a new person to sign our compliance agreement so they can start sending calls again

[8:17 AM, 4/20/2024] Amjad P-Tech: I fell asleep

[8:17 AM, 4/20/2024] Amjad P-Tech: Last night

[8:18 AM, 4/20/2024] Amjad P-Tech: Let me know when your available

[10:04 PM, 4/20/2024] Aaron: <https://tcpaworld.com/2021/11/29/dont-mess-with-texas-221500-00-judgment-on-just-28-illegal-calls-highlights-the-dangers-of-telemarketing-to-the-lone-star-state/>

[7:20 AM, 4/21/2024] Amjad P-Tech: Good Morning

[9:55 AM, 4/21/2024] Aaron: Good morning Amjad, I will get you paid for the calls we owe you for tomorrow during office hours, but I can't buy anything else from P Tech.

[10:05 AM, 4/21/2024] Amjad P-Tech: Can you send us new contract under company name:

Tip Top Group

[10:05 AM, 4/21/2024] Amjad P-Tech: Amjadadilwork@gmail.com

[10:10 AM, 4/21/2024] Aaron: It can't have your name or email on it

[10:11 AM, 4/21/2024] Aaron: And brother you don't listen. I explain to you the seriousness of TCPA and DNC laws before we ever started, and you sent me and unscrubbed list with litigators 🗨️🔗

[10:14 AM, 4/21/2024] Amjad P-Tech: Ok let me share you another company shortly

[10:16 AM, 4/21/2024] Amjad P-Tech: Brother i truely understand all that you tell me. Ive been in the industry for a while now

[1:34 PM, 4/21/2024] Aaron: I just forwarded you this guy's email that I received this morning <~~ Wes Newman's

[1:35 PM, 4/21/2024] Aaron: This is going to run me out of business

[1:38 PM, 4/21/2024] Amjad P-Tech: I read the email

Case 4:24-cv-01022-O-BP Document 12 Filed 01/06/25 Page 27 of 47 PageID 92  
[1:38 PM, 4/21/2024] Amjad P-Tech: This is serious. Are you available for a call ?

[1:43 PM, 4/21/2024] **Amjad P-Tech: Im hunting for the opt in for these two numbers in a very large database.**

**Kelly Pinn's Number**

**Wes Newman's Number**

[1:44 PM, 4/21/2024] Amjad P-Tech: Wait till tomorrow. Dont respond for now.

[1:44 PM, 4/21/2024] **Aaron: I'm tied up today with family stuff, but this may be what finally puts the nail in my companies coffin. I'm over it. I'm tired of all of the predators and TCPA violators in the industry brother. God obviously doesn't want me in insurance. We tried, and got our assess kicked**

[1:45 PM, 4/21/2024] Amjad P-Tech: Brother this a setback i agree but dont think like that. Trust me we will be out of this. Im more concerned about you. But we will settle with both Kelly and Especially wes newman.

We will pay them and ask for a certain duration of time.

They want easy money and we'll give it to them.

[2:03 PM, 4/21/2024] Amjad P-Tech: Bro dont shut it down. Spend time with your family for now. Lets talk tomorrow in detail

[6:25 AM, 4/22/2024] Amjad P-Tech: Good Morning

[9:28 AM, 4/22/2024] Amjad P-Tech: Let me know when your available

[10:28 AM, 4/22/2024] Aaron: So buried



[10:52 AM, 4/22/2024] Amjad P-Tech: Lmk when available

Need to disucss so we get out of the situation

[11:03 AM, 4/22/2024] Amjad P-Tech: Also getting pick up issues

Did you add new agents ?

[11:42 AM, 4/22/2024] Aaron: **Bro, please don't send any calls. I can't buy from you now.**

[10:11 AM, 4/21/2024] Aaron: And brother you don't listen. I explain to you the seriousness of TCPA and DNC laws before we ever started, and you sent me and unscrubbed list with litigators  

[10:14 AM, 4/21/2024] Amjad P-Tech: Ok let me share you another company shortly

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[1:34 PM, 4/21/2024] Aaron: I just forwarded you this guy's email that I received this morning ←----→ Wes Newman

[1:35 PM, 4/21/2024] Aaron: This is going to run me out of business

[1:38 PM, 4/21/2024] Amjad P-Tech: I read the email

[1:38 PM, 4/21/2024] Amjad P-Tech: This is serious. Are you available for a call ?

[1:43 PM, 4/21/2024] Amjad P-Tech: Im hunting for the opt in for these two numbers in a very large database.

8179032161

9406314523

[1:44 PM, 4/21/2024] Amjad P-Tech: Wait till tomorrow. Dont respond for now.

[1:44 PM, 4/21/2024] Aaron: I'm tied up today with family stuff, but this may be what finally puts the nail in my companies coffin. I'm over it. I'm tired of all of the predators and TCPA violators in the industry brother. God obviously doesn't want me in insurance. We tried, and got our assess kicked

[1:45 PM, 4/21/2024] Amjad P-Tech: Brother this a setback i agree but dont think like that. Trust me we will be out of this. Im more concerned about you. But we will settle with both Kelly and Especially wes newman.

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[2:03 PM, 4/21/2024] Amjad P-Tech: Bro dont shut it down. Spend time with your family for now. Lets talk tomorrow in detail

[6:25 AM, 4/22/2024] Amjad P-Tech: Good Morning

[9:28 AM, 4/22/2024] Amjad P-Tech: Let me know when your available

[10:28 AM, 4/22/2024] Aaron: So buried

[10:52 AM, 4/22/2024] Amjad P-Tech: Lmk when available

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[11:03 AM, 4/22/2024] Amjad P-Tech: Also getting pick up issues

Did you add new agents ?

[11:42 AM, 4/22/2024] Aaron: Bro, please don't send any calls. I can't buy from you now.

## Violations of the Telephone Consumer Protection Act (TCPA)

<support@1sttexasnational.com>

Tue, Apr 23, 2024 at 8:45 AM

To: "Kelly Pinn" <kpinn516@gmail.com>

Good morning Mrs. Pinn,

I am writing to you directly regarding your correspondence dated April 18, 2024, which alleges violations of the Telephone Consumer Protection Act (TCPA) by my agency. After a careful review of the points you raised, I feel it is essential to address them transparently and provide you with a full picture of the circumstances from my end.

Firstly, I would like to extend my apologies for any calls you received from my agency that were unwanted. It is important for me to clarify that my intent has always been to communicate solely with individuals who have demonstrated a clear interest in our services. Your interaction with my agency, which at one point seemed to be a genuine inquiry about insurance, concluded with you calling my 800 number to speak with me and requesting not to be called again—a request that I have strictly adhered to.

It's also pertinent to mention that my standard operational model does not involve making outbound calls, except for that one particular day when I followed up on what I had been assured were compliant, opt-in leads. Unfortunately, that assurance was misplaced. As soon as this came to light, I took immediate action to terminate my relationship with the vendor responsible for this error. The vendor, P Tech, provided me with your information in direct violation of the compliance agreement they signed on the sixth of last month, committing to adhere to all U.S. TCPA and DNC guidelines. Any violation of this agreement is grounds for immediate termination, which is the action I took.

I feel it is important for you to understand my agency's and family's current financial and operational status. The past three years have not been profitable for us, leading to severe cost-cutting measures, including my agency's two-week closure just six weeks ago due to a lack of funds. I began again after two weeks by reducing my marketing expenses. Then, two weeks later, after paying my sole contractor, my business account had a balance of a little over \$200 before any marketing expenses. Entering the insurance business required a significant financial outlay, including maxing out my credit cards, a situation I had not been in since before my bankruptcy in 2005. Consequently, I am facing considerable financial constraints that severely limit my ability to meet even essential business expenses. I am also the sole income provider for my 3-year-old son Adam, my spouse Adriana, and my dependent mother Janette, who is terminally ill with incurable blood cancer.

My agency's future is uncertain as I've already closed it once temporarily, and almost a second time permanently within the last six weeks. I realize now that a career in insurance is untenable long-term, and I am actively exploring other less risky opportunities that do not involve purchasing leads from

potentially unscrupulous marketers. The only asset I own is a 2014 Honda CRV that has issues. I rent and don't own property, and I owe the IRS \$50K in back taxes that I pay on monthly.

I share these personal details not to excuse any oversight on my part but to provide you with a candid view of our reality. I know it's my responsibility to ensure TCPA compliance, which is why, given our circumstances, I would never intentionally work with a marketing company that I believed could put my family in more financial harm.

Given these circumstances, meeting any kind of settlement in the thousands is beyond our financial capacity right now. Nonetheless, we remain committed to finding a resolution and would be interested in a plan that is both fair and feasible under the present conditions.

Your understanding in this matter is deeply appreciated, and we are open to any suggestions that could lead us toward a mutually acceptable solution. However, we are living week to week, and unless we're able to turn a profit consistently for a few weeks, I fear any offer we make would likely not satisfy you, and I also do not want to offend you.

Kindest regards,

**Aaron Hansome**  
1st Texas National Health & Life

**Billing & Cancellations: 888-261-2755**

**Email: [Support@1stTexasNational.com](mailto:Support@1stTexasNational.com)**

**New Policies & Changes: 800-733-3070**



## Violations of the Telephone Consumer Protection Act (TCPA)

Kelly Pinn <[REDACTED]@gmail.com>

Tue, Apr 23, 2024 at 10:26 AM

To: "support" <support@1sttexasnational.com>

Good afternoon Mr. Hansome. Thank you for your response. I would like to clarify that I didn't call you upon happenstance-I received an incoming call from your (800) 733-3070 number that was silent, on 4-10-2024 at 11:26am. I called back to identify the company responsible for the call I received, and was placed on hold and eventually connected to you at 11:51am. Then, I was called a third time from a lead marketer's number I've already asked once not to be called back from. I have included TMobile records for your review. That marketer knew I demanded not to be called, and he willingly called again, violating the TCPA.

I appreciate your acknowledgment of these violations and your desire to resolve this matter. As you have a compliance agreement with that particular vendor, you are free to seek reimbursement from them regarding this TCPA breach of contract. Whatever you both work out is up to you. I'm sorry to hear about your financial situation. Regardless of the challenges facing your industry, conducting business in a manner that repeatedly violates federal telemarketing laws and disregards the National Do Not Call Registry is unacceptable.

As a sign of good faith and in an attempt to resolve this matter quickly and without the added time and expenses that would be incurred if this is litigated through the courts, I am willing to resolve this matter for \$3,000 if you accept this offer by the end of business tomorrow (4/24/2024). I believe this to be a fair resolution as it is undoubtedly less than I would receive if I proceed with my attorneys and pursue this matter as the lead plaintiff in a federal suit. Also, as you may or may not be aware, individuals can be found personally liable for violations of the TCPA "when they directly participated in, or personally authorized, the violative conduct".

If you accept my offer, I will provide a standard release that is effective for all calls violating the TCPA made by your company prior to and including tomorrow's date. Funds will need to post by 4/30/24-acceptable payment methods include a wire transfer, Zelle or Venmo.

Please let me know if you accept my offer.

Respectfully,  
Kelly Pinn

## Violations of the Telephone Consumer Protection Act (TCPA)

Kelly Pinn <[REDACTED]@gmail.com>

Fri, Apr 26, 2024 at 12:07 PM

To: "support" <support@1sttexasnational.com>

Aaron, I left a message with one of your employees for you to call me immediately. I'm disappointed that I failed to hear from you Wednesday evening. This is my final attempt to resolve this dispute with you. Please contact me via cell at [REDACTED] or respond via email at [REDACTED] to discuss options available to resolve this TCPA matter. This email is being tracked and I will be notified upon your receipt. Your silence dictates my next move. I remain hopeful we can avoid federal litigation, settle this in a friendly manner and look forward to hearing from you.



## Notifications

^ Phon



**A13** ✕

**Mrs. Pinn's Phone Number.**

988 numbers &gt;

**A13**

try your call again

# 1st Texas Health & Life | Wes Newman DNC

<support@1sttexasnational.com>

Mon, Apr 29, 2024 at 12:24 PM

To: "Wes Newman" <[REDACTED]>

Good afternoon Wes,

Thank you for your understanding and for considering an alternative approach to resolve this issue. I agree that involving P Tech directly could be a constructive step, given that the issues arose from their actions which were in breach of their contract with us.

Here are the contact details for P Tech, the lead provider we used:

- **Company Name:** P Tech
- **Authorized Representative:** Amjad Adil, CEO
- **Contact Email:** amjadadilwork@gmail.com
- **Office Address:** G/6/4 ST 85 PLOT 12, Pakistan
- **Phone Number:** +92 334 5055111

The contract they signed on March 6th includes the following binding agreements:

**Term:** This Agreement shall commence on 3/6/24 and continue until 01/15/2025, unless terminated earlier according to the terms herein.

**Services:** The Provider agrees to generate leads for the Client through telemarketing and digital lead campaigns. All leads shall be generated in compliance with the Telephone Consumer Protection Act (TCPA) and relevant regulations.

**Compliance with TCPA:** The Provider warrants that all lead generation and communication practices shall strictly adhere to the TCPA guidelines, which includes, but is not limited to:

- Obtaining prior express written consent for telemarketing calls.
- Maintaining a Do-Not-Call list and honoring the national DNC list.
- Providing appropriate caller identification.

**Audit and Reporting:** The Provider agrees to maintain records of compliance and shall provide the Client with monthly compliance reports. The Client reserves the right to audit the Provider's operations to ensure TCPA compliance.

**Indemnification:** The Provider agrees to indemnify and hold harmless the Client from any fines, penalties, claims, or actions arising from the Provider's failure to comply with TCPA guidelines.

**Termination:** This Agreement may be terminated by either party with a 1-day written notice. Immediate termination is permissible upon breach of TCPA compliance obligations.

P Tech explicitly agreed in our contract to adhere to all TCPA guidelines and to indemnify 1st Texas Health & Life LLC from any claims or penalties arising from failures to comply with such guidelines. This includes obtaining prior express written consent for calls, maintaining records, and respecting the DNC list.

If you need any more information to assist in your discussions with P Tech, please let me know, and I will provide whatever is necessary within the bounds of our legal obligations and privacy considerations.

I am hopeful that they will address and rectify the situation responsibly, given the clear terms of our agreement. If there is anything more I can do to facilitate this process, do not hesitate to ask.

**Kindest Regards,**

**Aaron Hansome**  
**1st Texas National Health & Life**  
  
**Billing & Cancellations: 888-261-2755**  
  
**Email: [Support@1stTexasNational.com](mailto:Support@1stTexasNational.com)**  
  
**New Policies & Changes: 800-733-3070**



**Mrs. Pinn's Inbound Call Activity to My Agency Downloaded From Ring Central**

Type	Number	Caller ID	Date	Time	Device	Status	Direction	Duration	Notes
Voice		PINN,KELLY	Fri 04/26/2024	11:13 AM	Phone Call	Accepted	Inbound Call	0:01:57	Call to Pressure For \$3000 as evidenced in email.
Voice		PINN,KELLY	Tue 04/16/2024	3:47 PM	Phone Call	Accepted	Inbound Call	0:05:04	Inbound Call. Mrs. Pinn wanted in Insurance
Voice		PINN,KELLY	Wed 04/10/2024	9:51 AM	Phone Call	Accepted	Inbound Call	0:05:30	Mrs. Pinn saw Aaron's missed call, and called back as if she were interested.

## Violations of the Telephone Consumer Protection Act (TCPA)

Kelly Pinn <[REDACTED]@gmail.com>

Wed, May 1, 2024 at 1:07 PM

To: "support@1sttexasnational.com" <support@1sttexasnational.com>

Aaron, your deadline to respond with a reasonable and realistic **solution** to this TCPA matter expires at 5pm today. If I fail to hear from you by then, I will move forward with retaining counsel. I have a conference scheduled this Friday with one of my attorneys representing me in a latest federal TCPA class action suit, and I will be discussing the facts, evidence and logistics of this case with him at that time. Please feel free to google or search me In PACER to confirm my sincerity and promise to follow through with my rights under the law. I remain hopeful we can solve this in a friendly manner.

Kelly

## Violations of the Telephone Consumer Protection Act (TCPA)

<support@1sttexasnational.com>

Thu, May 2, 2024 at 9:51 AM

To: "Kelly Pinn" <[REDACTED]@gmail.com>

Good morning Kelly,

Thank you for your follow-up and for sharing additional details regarding your concerns. I understand the situation remains frustrating, and I appreciate your patience as we navigate these issues.

I also apologize for my delayed responses. For the last four weeks, I've been working seven days a week, approximately 70 hours, to protect my family's finances so we're not faced with eviction or worse, a situation we've unfortunately had to consider several times over the last two years, and most recently just a month ago. Additionally, this morning involved taking my mother Janette, to chemotherapy for her lymphoma.

Regarding your question about whether P Tech contacted you, I must clarify: the only call made by our agency was on April 10th, and it was intended to be to DNC-compliant numbers. Unfortunately, due to a manual error on my part during the list scrubbing process on April 9th, your number was not removed despite being marked as DNC. This error is mine alone, and typically, my provider handles this automatically, which did not happen in this case.

I have evidence of the scrubbing process from April 9th which I'm happy to provide. The list in question came from P Tech, and it was supposed to be fully compliant with all DNC and TCPA regulations, including verifiable opt-in statuses. We queried all of our vendors when we received your complaint, and terminated our relationship with P Tech immediately upon discovering the breach of our contract.

As for the number (817) 535-0523, it is not associated with our agency, and I have no knowledge of who it might belong to.

Regarding the WhatsApp message from "Paul" at "Walf Media," I have no record or knowledge of this entity or individual. After receiving your initial complaint, we contacted all our vendors to relay your concerns and your demand for \$8000. It is possible this contact came from another vendor, but they were not authorized by us to make any representations on our behalf.

We maintain a strict policy with our vendors, and any breach of this policy, as demonstrated by P Tech, is dealt with immediately. I will further investigate any potential involvement of other vendors to ensure no unauthorized representations are being made on behalf of 1st Texas Health & Life LLC.

As previously mentioned, our financial situation has been extremely precarious, operating on a week-to-week basis. It appears we will have a small surplus next week after tomorrow's payments are processed. I am prepared to offer \$300 tomorrow as a gesture of good faith to demonstrate our commitment to resolving your concerns amicably. I realize this is far from your initial request, but it

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is all I can manage this week. Depending on our financial situation, maybe I can do the same next week.

A17

If you decide to file suit, it's in God's hands.

Additionally, here is P Tech's company information for your reference:

- **Company Name:** P Tech
- **Authorized Representative:** Amjad Adil, CEO
- **Contact Email:** [amjadadilwork@gmail.com](mailto:amjadadilwork@gmail.com)
- **Office Address:** G/6/4 ST 85 PLOT 12, Pakistan
- **Phone Number:** +92 334 5055111

I hope this response clarifies any misunderstandings and demonstrates our intent to resolve this issue fairly. Your understanding and cooperation are greatly appreciated as we navigate these challenging circumstances.

Thank you again for your attention to this matter.

Respectfully,

**Aaron Hansome**  
**1st Texas National Health & Life**

**Billing & Cancellations:** 888-261-2755

**Email:** [Support@1stTexasNational.com](mailto:Support@1stTexasNational.com)

**New Policies & Changes:** 800-733-3070



DNC Policy Reuquest

**From** Kelly Bland <[REDACTED]@gmail.com>  
**To** <Support@1sttexasnational.com>  
**Date** 2024-09-20 12:02

Hello my name is Kelly Bland and I'm requesting a copy of 1st Texas Life & Health LLC's internal do-not-call policy that is on file.



Re: DNC Policy Reuquest

From


1st Texas National <support@1sttexasnational.com>

To

Kelly Bland <[REDACTED]@gmail.com>

Date

2024-09-26 10:04

 Internal\_DNC\_1stTex\_20240102\_Signed.pdf (~3.1 MB)

Here you go Kelly.

---  
Kindest regards,

1st Texas National Health & Life

Billing & Cancellations: 888-261-2755

Email: [Support@1stTexasNational.com](mailto:Support@1stTexasNational.com)



New Policies & Changes: 800-733-3070  
License: 4144203 NPN: 20161234

On 2024-09-20 12:02, Kelly Bland wrote:

Hello my name is Kelly Bland and I'm requesting a copy of 1st Texas Life & Health LLC's internal do-not-call policy that is on file.

Bland v 1st Texas Health & Life LLC et al

From


Kelly Bland [REDACTED]@gmail.com>


To

<Support@1sttexasnational.com>

Date

2024-10-16 11:59

 Bland v 1st Texas et al.pdf (~387 KB)

 Civil Cover Sheet.pdf (~890 KB)

Dear Mr. Hansome,

Please consider this email as my last attempt to cure this matter together versus litigation. As you already may know I'm well versed under the TCPA and have no issue getting the attached lawsuit filed. Aside from the TCPA violations I searched the Texas solicitation database and found that neither 1st Texas or yourself hold a certificate of registration and bond on file to solicit into Texas [Telephone Solicitors Search \(state.tx.us\)](https://www.state.tx.us/tss/TelephoneSolicitorsSearch.aspx), which is a penalty of \$5,000 per call. I'm well aware of your relationship with your telemarketers.

**My demand offer is now \$12,000 to cure this matter without litigation. If I'm forced to file this lawsuit I will be seeking max damages of \$54,500.**

If I don't receive a response back to this email within 24hrs of me receiving the confirmed read receipt, my offer will be off the table and I will proceed through the court system.

Respectfully,  
Kelly Bland



Aaron Hansome <aaronmhansome@gmail.com>

## Urgent! BizFilings received Process in Texas for 1st Texas Health & Life LLC

**BizFilings** <sop@bizfilings.com>

Fri, Nov 8, 2024 at 1:13 PM

To: aaronmhansome@gmail.com

[Home](#)

[Account](#)

[Customer Service](#)

Questions? Call 1-800-981-7183

### Service Of Process Notification

Dear Aaron Hansome,

BizFilings serves as the registered agent for your company in the state of Texas.

BizFilings received a service of process document on behalf of your company. It is important for us to know that you have received delivery of your Service of Process.

Please log in to your online account by clicking on the link below and entering your user name and password.

**[Please click here to view your Service of Process Document.](#)**

Once you have viewed the document, our system will automatically acknowledge receipt for you.

Our Registered Agent team will follow up with you by phone and email if we do not receive your acknowledgement.

If you do not know your user name and password you can use the forgot password [link](#), or you can contact our Registered Agent team at 800-981-7183 and then press 2.

Below is a summary of the information.

Title of Action: SOP Medical Injury - Improper Care and Treatment

Date Served: 11/8/2024

Method of Service: Process Server

Plaintiff's Attorney: See document

#### Need help?

Contact us with any questions or concerns:

**Email:** [Agent@BizFilings.com](mailto:Agent@BizFilings.com)

**Phone:** M-F 8am-6PM CT

1-800-981-7183

Attorney's Phone Number: See document

Answer Date: See document

Special Notes: Log # 547734805

**Convenient access, secure storage:** View your documents from home, at work, or on the road. Download at your convenience.

All service of process documents we have ever received on your behalf are securely posted to the Company Documents section of your online account for you to download at your convenience. BizFilings will notify you by email when we receive a service of process document on your behalf and it is the customer's responsibility to keep a valid email on file with us to ensure you receive timely notice.

If you would like a hard copy of your service of process document, please contact our registered agent department within 48 hours at (800)-981-7183 or (608)-827-5300, Monday - Friday 8:00 AM - 6:00 PM central time. Shipping fees of \$16.95 will apply for each sent.

**Committed to your business success,**

The BizFilings Registered Agent Team

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Disclaimer: BizFilings is not a law firm and does not provide legal advice. If legal advice is required, please seek the services of an attorney. Read BizFilings' full terms of use at <http://www.BizFilings.com/service/terms-of-use.aspx>.

I, **Amjad Adil**, Chief Executive Officer of P-Tech, with an address at G/6/4 ST 85 PLOT 12, solemnly declare and affirm under penalty of perjury under the laws of the United States of America that the following is true and correct:

**1. Agreement to Provide TCPA-Compliant Leads:**

- On March 6, 2024, P-Tech entered into a Lead Generation Services Agreement with 1st Texas Health & Life LLC (“Client”), agreeing to generate and provide leads that fully complied with the Telephone Consumer Protection Act (TCPA) and related regulations.
- The agreement expressly required P-Tech to ensure that all leads were opt-in and DNC-compliant and to maintain records verifying TCPA compliance.

**2. Provision of Non-Compliant Leads:**

- On April 9, 2024, P-Tech provided a lead list to the Client as part of its contracted services.
- Upon review, it has been confirmed that the list contained contacts who had not provided prior express written consent for telemarketing calls, thereby violating TCPA compliance standards.

**3. Resulting Consequences:**

- On April 10, 2024, calls made to individuals on the provided list included one recipient, a known serial litigant, who is now pursuing legal action against the Client under the TCPA.
- This legal action has directly resulted from P-Tech’s failure to adhere to the compliance obligations outlined in the agreement.

**4. Acknowledgment of Breach:**

- I accept responsibility for P-Tech’s failure to ensure the compliance of the lead list provided to the Client.
- P-Tech acknowledges its breach of the contractual obligations and the compliance requirements under the TCPA.

**5. Corrective Measures:**

- Moving forward, P-Tech commits to the following actions to ensure compliance with the TCPA:
  - Implementing enhanced lead verification processes to confirm opt-in consent for all contacts before inclusion in lead lists.
  - Providing monthly compliance reports to the Client as outlined in the original agreement.
  - Maintaining and sharing documentation verifying compliance for each lead provided.

**6. Indemnification:**

- P-Tech acknowledges its obligation to indemnify 1st Texas Health & Life LLC from any claims, fines, penalties, or damages arising from this breach, as stipulated in the signed Lead Generation Services Agreement.

**Contact Information:**

Email: amjadadilwork@gmail.com

Phone: +92 334 5055111

I declare under penalty of perjury that the foregoing is true and correct.

**Date:** 01/01/2025

**Signed:** Amjad with P-Tech

**Amjad Adil** - Chief Executive Officer - P-Tech



Completed Document Audit Report

Completed with SignWell.com

Title: P-Tech Unsworn Declaration Under Penalty of Perjury

Document ID: d9faa4c3-80d8-4d1f-8699-6ea569fadce7




Time Zone: (GMT+00:00) Coordinated Universal Time

Files

P-Tech Unsworn Declaration Under Penalty of Perjur.docx - 2 pages

Jan 01, 2025 21:30:19 UTC

Activity

 Aaron Hansome	created the document (aaron@defenseclaims.com)	Jan 01, 2025 21:30:55 UTC
IP: 89.41.26.54		
 Amjad with P-Tech	first viewed document via Signing Link (amjadadilwork@gmail.com)	Jan 01, 2025 21:32:36 UTC
IP: 2806:290:880a:8479:192c:140e:73cc:e7ee		
 Amjad with P-Tech	signed the document (amjadadilwork@gmail.com)	Jan 02, 2025 09:33:13 UTC
IP: 2a09:bac2:4f75:18be::277:1		